

Reagan E. Bradford, OBA #22072*
Ryan K. Wilson, OBA #33306*
*admitted *pro hac vice*
BRADFORD & WILSON PLLC
431 W. Main Street, Suite D
Oklahoma City, OK 73102
(405) 698-2770
reagan@bradwil.com
ryan@bradwil.com

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF WYOMING**

Madeline A. Wright, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

Civil Action No. 22-CV-213-KHR

Devon Energy Production Company, L.P.,

Defendant.

**SUPPLEMENT TO
CLASS REPRESENTATIVE’S MOTION FOR
FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT**

Class Representative submits this Supplement to her Motion for Final Approval of the Class Action Settlement and Brief in Support (“Final Approval Motion,” Docs. 36–37). As is common, Class Representative’s Final Approval Motion was due prior to the request for exclusion and objection deadline of July 16, 2024. Doc. 37 at 1 n.1. As a result, Class Representative submits this supplement to address the objections (none) and requests for exclusions (ten).

1. Objections

Class Representative is pleased to report that there have been no objections to the Settlement, Settlement Agreement, or the requests for Plaintiff’s Attorneys’ Fees, Litigation Expenses, Administration, Notice, and Distribution Costs, and Case Contribution Award.

2. Requests for Exclusion

Only ten (10) requests for exclusion were submitted. *See Ex. 1*, JND Summary of Requests for Exclusion.¹ The amounts attributable to these requests represent 5.892% of the Net Settlement Fund under the Initial Plan of Allocation (Doc. 37-6). *Id.* Accordingly, the Class Member claims that have chosen to participate in and support the Settlement represent 94.108% of the Net Settlement Fund. With respect to approving a class action settlement, the Tenth Circuit has held that a district court did not abuse its discretion in approving a class settlement from which a “small percentage of class members opted out.” *Rutter & Wilbanks Corp. v. Shell Oil Co.*, 314 F.3d 1180, 1188 (10th Cir. 2002).

Class Representative recommends approving the ten (10) requests for exclusion at the Final Fairness Hearing on August 6, 2024.

Conclusion

In short, the information necessary for Class Members to consider their options under the Settlement has been provided in accordance with the Court’s Preliminary Approval Order (Doc. 33) and the Notices. There have been no objections and only ten (10) requests for exclusion. Class Representative respectfully requests that the Court approve the Settlement and grant the final approval motions (Docs. 36–39). Class Counsel is contemporaneously submitting native proposed orders to the Court’s intake email, and those proposed orders take into account the requests for exclusion detailed herein.

¹ The requests for exclusion received by the Settlement Administrator are associated with ten (10) distinct owner numbers in Devon’s system, however, three (3) are associated with Kaiser-Francis Oil Company and three (3) are associated with Citation Oil & Gas Corp. In other words, six (6) total class members submitted requests for exclusion associated with ten (10) distinct owner numbers in Devon’s system.

Respectfully Submitted,

/s/ Reagan E. Bradford

Reagan E. Bradford, OBA #22072*

Ryan K. Wilson, OBA #33306*

*admitted *pro hac vice*

BRADFORD & WILSON PLLC

431 W. Main Street, Suite D

Oklahoma City, OK 73102

(405) 698-2770

(405) 234-5506 fax

reagan@bradwil.com

ryan@bradwil.com

~~–and–~~

Rick Erb 6-2663

RICHARD A. ERB, JR., PC

PO Box 36

Gillette, WY 82717

(307) 682-0215

(307) 682-1339 fax

rick@rickerb.com

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court's electronic filing system.

/s/ Reagan E. Bradford

Reagan E. Bradford